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16  
17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **OAKLAND DIVISION**  
20

21 TIFFANY RUFFA, KATHRYN CANFIELD,  
22 and ISIDORE NIYONGABO, on behalf of  
themselves and all others similarly situated,

23 Plaintiffs,

24 v.

25 SOCIETY FOR HUMAN RESOURCE  
MANAGEMENT,

26 Defendant.  
27  
28

**Case No. 4:21-cv-05549-DMR**

**JOINT STATUS REPORT ON  
MEDIATION AND STIPULATION TO  
EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT AND COMPLETE  
MEDIATION PROCESS PURSUANT TO  
GENERAL ORDER 56**

Complaint Filed: July 20, 2021

Current Response Date: May 6, 2022

New Response Date: May 27, 2022

Stipulation To Extend Time to Respond to Complaint and  
Complete Mediation Process

Case No. 4:21-cv-05549-DMR

1 Plaintiffs Tiffany Ruffa, Kathryn Canfield, and Isidore Niyongabo (“Plaintiffs”) and  
 2 Defendant Society for Human Resource Management (“Defendant”), by and through their  
 3 respective counsel, submit this joint status report pursuant to the Court’s March 2, 2022 order  
 4 (Dkt. No. 18) and jointly stipulate to extend the time for (1) the completion of the mediation  
 5 process pursuant to General Order 56 from April 29, 2022 until May 20, 2022, and (2) Defendant  
 6 to respond to the Complaint from May 6, 2022 to May 27, 2022.

## 7 **I. STATUS REPORT**

8 On March 1, 2022, the Parties held their first Settlement Conference with court-assigned  
 9 mediator Jamie L. Dupree. As the Parties previously reported to the Court, they made progress  
 10 during the March 1 conference, but were unable to achieve a complete resolution.

11 Since the March 1 Settlement Conference, the Parties have continued to make progress  
 12 through the exchange of settlement agreement drafts with the intention of reaching agreement on  
 13 all non-monetary terms of a potential settlement prior to their next settlement conference with  
 14 Ms. Dupree on May 9, 2022.

15 The Parties intend to submit another joint status report to the Court following their May 9  
 16 settlement conference.

## 17 **II. JOINT STIPULATION**

18 Given the progress the Parties have made, and continue to make in their negotiations,  
 19 they now stipulate to extend the time for (1) the completion of the mediation process pursuant to  
 20 General Order 56 until May 20, 2022 and (2) Defendant to respond to the Complaint from May  
 21 6, 2022 to May 27, 2022.

22 This stipulation is made in good faith and not for the purpose of causing unwarranted  
 23 delay. Good cause supports the extension. First, the Parties have sought four prior stipulated  
 24 extensions of Defendant’s deadline to respond to the Complaint in order to engage in ongoing  
 25 settlement negotiations, and one prior extension of the deadline to complete mediation pursuant  
 26 to General Order 56. (Dkt. Nos. 8, 11, 16, & 17.) Second, the Parties engaged in a Settlement  
 27 Conference on March 1, 2022, by the court’s original deadline to complete mediation pursuant to  
 28 General Order 56, are continuing to engage in good faith settlement negotiations with another

1 conference scheduled for May 9, 2022, as discussed above. Third, the Parties are complying with  
2 this Court's General Order 56 and the Court's scheduling order in this case (Dkt. No. 5).

3 IT IS SO STIPULATED.

4 DATED: April 22, 2022

HOLLAND AND KNIGHT LLP

5 By: /s/ John H. Haney

6 Thomas E. Hill  
7 Kristina S. Azlin  
8 John H. Haney

*Attorneys for Defendant*

9 DATED: April 22, 2022

**DISABILITY RIGHTS ADVOCATES**

10 By: /s/ Meredith J. Weaver

11 Emily Seelenfreund  
12 Meredith J. Weaver  
13 Rebecca Williford

*Attorneys for Plaintiffs*

14 **ATTESTATION OF CONSENT**

15 I hereby attest that all other signatories listed, and on whose behalf the filing is submitted,  
16 concur in the filing's content and have authorized the electronic filing of this document with  
17 their signature.

18 DATED: April 22, 2022

19 By: /s/ John H. Haney  
20 John H. Haney